

From: [Tidmore, Guy](#)
To: [Moore, Gary](#)
Subject: Re: CES
Date: Monday, January 19, 2015 5:42:56 PM

That works.

Guy Tidmore, Chief
Compliance Enforcement Section
Hazardous Waste Branch
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Sent from my iPhone

On Jan 16, 2015, at 10:07 AM, Moore, Gary <Moore.Gary@epa.gov> wrote:

Guy:

I would guess then that if there are no labels on them to determine that they are or not a P waste chemical then we would not have to make any assumption that they are. As you know, there are virtually no labels on the containers located at this place.

I will check out the P wastes to see if it is reasonable that we would have had any of these chemicals.

Thanks

Gary Moore

Federal On-Scene Coordinator

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moore.gary@epa.gov

From: Tidmore, Guy
Sent: Friday, January 16, 2015 9:49 AM
To: Moore, Gary
Subject: Re: CES

If the drum is truly empty, and did not previously contain a chemical that would be a P waste, we would have no regulatory authority over it.

Guy Tidmore, Chief



9855475

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Sent from my iPhone

On Jan 16, 2015, at 8:57 AM, Moore, Gary <Moore.Gary@epa.gov> wrote:

Guy:

Happy New Year. I am still out at this dump. I have a RCRA Question.

We have a bunch of totes/drums that we need to get rid of and I wanted to confirm the RCRA rules associated with the drum disposal/recycle. Most drum recycling companies (ie. National Container Corp, Industrial Container Corp, West Texas Drum) require the drums to have:

- 1. Drum Product Label**
- 2. Want MSDS for the Last Product**
- 3. Want the Drum cleaned and drip dry**

What are the Federal requirements associated with empty containers? I will also ask TCEQ.

Thanks

Gary Moore

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